



August 14, 2013

Mr. Robert G. Heiss  
Office of Enforcement and Compliance Assurance  
Office of Federal Activities  
International Compliance Assurance Division  
Environmental Protection Agency  
Ariel Rios Bldg., Room 6144  
12<sup>th</sup> St. and Pennsylvania Ave., NW.  
Washington, DC 20004

Via Federal Express and E-mail

**Re: Severstal Columbus (Hazardous Waste ID #MSR000103143)  
Annual Reports Required by 40 C.F.R. § 262.56  
for reporting years 2010, 2011, 2012**

Dear Mr. Heiss,

After conducting an internal environmental audit, Severstal Columbus, LLC ("Severstal") has recently discovered that annual reports required by Section 262.56 for reporting years 2010, 2011 and 2012 were not filed with your office. In an effort to remedy this issue, Severstal makes this self-disclosure and submits the required reports for your review. Severstal began exportation of steel dust (K061 waste) to Mexico in 2010. Notices of Intent to Export have been filed by Severstal since export operations began and Acknowledgements of Consent were received. We are unsure as to why the annual reports were not previously filed, but we have instituted remedial measures to ensure the reports are timely filed going forward.

If you have any questions concerning this matter, please do not hesitate to contact me at 662- 245-4242.

Sincerely,

Stan Atkins  
Environmental Manager

enclosures

cc: Ann Stephanos

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**2012**  
**Annual Export Report**  
**per 40 C.F.R. § 262.56**

<b>Calendar Year:</b>	2012
<b>Exporter:</b>	
EPA Identification Number	MSR000103143
Name	Severstal Columbus
Site Address	1945 Airport Road Columbus, MS 39701
Mailing Address	PO Box 1467 Columbus, MS 39703
<b>Consignee:</b>	
Name	Zinc Nacional, S. A
Site Address	Serafin Pena #938 Monterrey, N. L., Mexico 64000
<b>Primary Transporter:</b>	
US EPA Identification Number	a) MSR 000 103 721 b) MOD 006 965 859
Name(s)	a) Columbus and Greenville Railway Co. (GAGY) is the pickup railroad b) Kansas City Southern Railway Co. (KCS) is the delivering railroad.
<b>Hazardous Waste (HW) Shipped:</b>	
Description	Electric Arc Furnace ("EAF") Dust
EPA HW Number(s)	K061
DOT Hazard Class	RQ, Hazardous Waste Solid, N.O.S. 9, UN3077, PGIII, (K061)
Total Amount Shipped	22,839.72 Short Tons
Change from previous year	17.19 percent increase
Number of Shipments	235 cars
Waste Minimization Efforts	The steel dust shipped to Zinc Nacional is recycled, thus decreasing the amount of waste that would otherwise be disposed in a hazardous waste landfill.
<b>Certification:</b>	
Name	Stan Atkins
Title	Environmental Manager
Signature	
Date	8/13/2013

Per my signature above, I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment.

## Nelson, Scott

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**From:** Heiss, Robert  
**Sent:** Wednesday, August 14, 2013 10:05 AM  
**To:** Kreisler, Eva; Nelson, Scott  
**Subject:** FW: Severstal Columbus - Annual reports for 2010, 2011, and 2012  
**Attachments:** Cover Letter for Submittal of 2010 - 2012 Annual Reports.docx; 2010 Annual Report.docx; 2011 Annual Report.docx; 2012 Annual Report.docx  
**Importance:** High

fyi

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**From:** Atkins, Stan [<mailto:Stan.Atkins@severstalna.com>]  
**Sent:** Wednesday, August 14, 2013 10:00 AM  
**To:** Heiss, Robert; Stephanos, Ann  
**Cc:** Gary Rikard  
**Subject:** Severstal Columbus - Annual reports for 2010, 2011, and 2012  
**Importance:** High

Mr. Heiss and Mrs. Stephanos,

Attached you will find a cover letter and annual reports required by Section 262.56. I am sending the original documents to Mr. Heiss via FedEx. It is my understanding that our outside counsel, Gary Rikard, previously contacted both of you to inform you about our intent to self-disclose and file these annual reports. After your review of the reports, if you have any questions please contact me at 662-245-4242 or Mr. Rikard at 601-540-3625.

Thank you.

Stan Atkins